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17 Attorneys for Plaintiff  
18 MARVELL SEMICONDUCTOR, INC.

19 UNITED STATES DISTRICT COURT  
20 NORTHERN DISTRICT OF CALIFORNIA  
21 SAN FRANCISCO DIVISION

22 MARVELL SEMICONDUCTOR, INC.,  
23 Plaintiff,  
24 v.  
25 WI-LAN, INC.,  
26 Defendant.

CASE NO. C07-05626 SI

**DECLARATION OF SHYAM  
KRISHNAMURTHY IN SUPPORT OF  
MARVELL SEMICONDUCTOR,  
INC.'S OPPOSITION TO WI-LAN,  
INC.'S MOTION TO DISMISS  
MARVELL SEMICONDUCTOR,  
INC.'S SUIT FOR DECLARATORY  
RELIEF**

**Hearing Date: June 20, 2008  
Location: Courtroom 10, 19<sup>th</sup> Fl.  
Time: 9:00 a.m.**

**[REDACTED VERSION FOR PUBLIC  
VIEWING]**

1 I, Shyam Krishnamurthy, hereby declare the following:

2 1. I am Director of Marketing for plaintiff Marvell Semiconductor, Inc. In that role, I  
3 have been responsible for marketing Marvell's current and planned wireless and cellular products to  
4 its customers. The matters contained in this declaration are of my own personal knowledge and, if  
5 called as a witness, I could and would testify competently to the matters set forth herein.

6 2. I make this Declaration in support of Marvell Semiconductor, Inc.'s Opposition to Wi-  
7 LAN, Inc.'s Motion To Dismiss Marvell Semiconductor, Inc.'s Suit for Declaratory Relief.

8 3. Marvell designs and makes a wide variety of products to be used by customers in  
9 wireless and cellular products. For interoperability, these Marvell products adhere to international  
10 standards promulgated by the 3rd Generation Partnership Project (3GPP), a collaboration between  
11 groups of telecommunications associations that issues globally applicable third generation (3G)  
12 mobile phone system specifications within the scope of the International Mobile  
13 Telecommunications-2000 project of the International Telecommunication Union (ITU). 3GPP  
14 specifications are based on evolved Global System for Mobile Communications (GSM)  
15 specifications.

16 4. Versions of the 3GPP standard are called "Releases". Release 99 specified the first  
17 Universal Mobile Telecommunications System (UMTS) 3G networks, incorporating a Code  
18 Division Multiple Access (CDMA) air interface. The standard was finalized and released in early  
19 2000.

20 5. Release 5 was released in early 2002. Release 5 builds on the architecture described in  
21 Release 99, plus additional features, such as IP Multimedia Subsystem (IMS), an architectural  
22 framework for delivering internet protocol (IP) multimedia to mobile users and High-Speed  
23 Downlink Packet Access (HSDPA), which allows networks based on Universal Mobile  
24 Telecommunications System (UMTS) to have higher downlink data transfer speeds and capacity.  
25 For example, in products based on Release 99, the maximum downlink speed is 364kbps. HSDPA  
26 deployments support down-link speeds of 1.8, 3.6, 7.2, 10.8 and 14.4 Mbit/s and speeds in between.  
27 Further speed increases are planned for the near future.  
28

1           6.     Marvell is an international company in the business of developing the world's next  
2 generation products. Marvell communications processors are fully integrated devices for today's  
3 GSM, GPRS, and WCDMA mobile phones.

4           7.     Marvell's PXA90x, a.k.a "Hermon," communications processor supports GSM,  
5 GPRS, and WCDMA mobile standards, such as 3GPP. Marvell is currently selling products based  
6 on Release 99.

7           8.     Marvell has designed and developed products that comply with Release 5 and has  
8 begun selling these products in mass quantities. The design of the initial Release 5 product, known  
9 internally in Marvell as the Tavor product family, is complete and it is on the verge of mass  
10 production and inclusion in various consumer end products. As specified in Release 5, these  
11 products will support HSDPA base station to mobile unit data rates greater than 364 kbps.

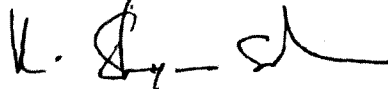
12          9.     [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]

17          10.    [REDACTED]  
18 [REDACTED]

19          11.    [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
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3 12. I declare under penalty of perjury under the laws of the United States of America that  
4 the foregoing is true and correct. Executed this 29<sup>th</sup> day of May, 2008, in San Diego, California.

5 Respectfully submitted,

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8 Dated: May 29, 2008

By: Shyam Krishnamurthy  
Director, Marketing, Marvell Semiconductor, Inc.

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DECLARATION IN SUPPORT OF MARVELL'S OPP. TO MOT. TO WI-LAN'S  
MOT. TO DISMISS

Case No. C07-05626 SI